BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF DELAWARE

IN THE MATTER OF THE APPLICATION	)	
OF DELMARVA POWER & LIGHT	)	
COMPANY FOR AN INCREASE IN	)	**PSC DOCKET NO. 09-414**
ELECTRIC BASE RATES AND	)	
MISCELLANEOUS	)	
TARIFF CHANGES	)	
(FILED SEPTEMBER 18, 2009)	)	
IN THE MATTER OF THE APPLICATION	)	
OF DELMARVA POWER & LIGHT	)	
COMPANY FOR APPROVAL OF A	)	**PSC DOCKET NO. 09-276T**
MODIFIED FIXED VARIABLE	)	
RATE DESIGN FOR ELECTRIC RATES	)	
(FILED JUNE 25, 2009)	)	

DIRECT TESTIMONY OF STEVE W. CHRISS ON BEHALF OF WAL-MART STORES EAST, LP AND SAM'S EAST, INC.

Dated: February 10, 2010

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND OCCUPATION.

A. My name is Steve W. Chriss. My business address is 2001 SE 10th St., Bentonville, AR 72716-0550. I am Manager, State Rate Proceedings, for Wal-Mart Stores, Inc.

Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS CAUSE?

A. I am testifying on behalf of Wal-Mart Stores East, LP and Sam's East, Inc. (collectively "Walmart").

Q. PLEASE DESCRIBE YOUR EDUCATION AND EXPERIENCE.

A. In 2001, I completed a Masters of Science in Agricultural Economics at Louisiana State University. From 2001 to 2003, I was an Analyst and later a Senior Analyst at the Houston office of Econ One Research, Inc., a Los Angeles-based consulting firm. My duties included research and analysis on domestic and international energy and regulatory issues. From 2003 to 2007, I was an Economist and later a Senior Utility Analyst at the Public Utility Commission of Oregon in Salem, Oregon. My duties included appearing as a witness for PUC Staff in electric, natural gas, and telecommunications dockets. I joined the energy department at Walmart in July 2007. My Witness Qualifications Statement is found on Exhibit SWC-1.

Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE DELAWARE PUBLIC SERVIC COMMISSION ("THE COMMISSION")?

A. No.

Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE OTHER STATE REGULATORY COMMISSIONS?

A. Yes. I have submitted testimony before utility regulatory commissions in Arkansas, Colorado, Indiana, Louisiana, Nevada, New Mexico, Oklahoma, Oregon, South Carolina, Utah, and Virginia on dockets regarding cost of service and rate design, qualifying facility rates, telecommunications deregulation, resource certification, energy efficiency/demand side management, fuel cost adjustment mechanisms, and the collection of cash earnings on construction work in progress.

Q. HAVE YOU PREPARED EXHIBITS?

A. Yes. I have prepared Exhibit SWC-1, consisting of four pages.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to address issues related to revenue allocation and rate design, responding specifically to the testimony of Delmarva witness Joseph F. Janocha.

Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS.

A. My recommendations are as follows:

1) The Commission should approve the Company's proposed revenue allocation model in this docket;

2) The Commission should, at a minimum, adopt a distribution rate design in this docket that eliminates volumetric energy charges for the collection of demand costs;

3) If the Commission approves the proposed rate design, it should order Delmarva to create a customer education process in which customers can, at no cost to the customer, access the underlying calculations for their Transmission PLC billing determinants. Additionally, the Commission should require the Company to include a full description of how the Transmission PLC is calculated in its tariff, including descriptions of calculations for new construction and the sale of a customer premises to a new owner.

Revenue Allocation

Q. GENERALLY, WHAT IS WAL-MART'S POSITION ON SETTING RATES BASED ON THE UTILITY'S COST OF SERVICE?

A. Wal-Mart advocates that rates be set based on the utility's cost of service. This produces equitable rates that reflect cost causation, send proper price signals, and minimize price distortions.

Q. WHAT IS THE COMPANY'S STATED GOAL FOR REVENUE ALLOCATION IN THIS DOCKET?

A. The Company's stated goal for revenue allocation is to provide distribution rates that reflect the underlying cost of service. *See* Testimony of Joseph F. Janocha, page 4, lines 7 to 10.

Q. DOES THE COMPANY'S PROPOSED REVENUE ALLOCATION REFLECT THE COMPANY'S COST OF SERVICE?

A. Generally, yes. The Company's revenue allocation proposal produces rates under which most classes are at or near their cost of service. *See* Exhibit JFJ-1.

Q. WHAT IS YOUR RECOMMENDATION FOR REVENUE ALLOCATION IN THIS DOCKET?

A. The Commission should approve the Company's proposed revenue allocation model in this docket.

Rate Design

Q. WHAT IS THE COMPANY'S STATED GOAL FOR RATE DESIGN IN THIS DOCKET?

A. The Company's stated goal for rate design in this docket is two-fold: 1) to establish a distribution rate structure that stabilizes distribution revenues and 2) to reduce (or eliminate) the relationship between distribution revenue and energy consumption. *See* Testimony of Joseph F. Janocha, page 4, lines 11 to 13.

Q. DO YOU BELIEVE THE COMPANY IS INTERESTED IN PURSUING SOME FORM OF WHAT IS KNOWN AS DECOUPLING?

A. Yes. The Company has submitted their rate design as a decoupling proposal to satisfy the requirements of Title 26 of the Delaware Code, which states:

> Decoupled rate design mechanisms will be implemented by no later than December 2010 for regulated natural gas and electric utilities such that delivery rate structures provide for an appropriate, cost-based level of revenue recovery which will remove disincentives to investment in demand response programs and conservation and improved efficiency of energy use. *See* Delaware Code Title 26, Chapter 15, §1500(8).

Q. FROM A POLICY PERSPECTIVE, WHAT IS YOUR UNDERSTANDING OF THE ROLE OF DECOUPLING MECHANISMS?

A. Decoupling mechanisms are regulatory risk management tools employed to encourage a utility to promote energy efficiency when doing so may have the potential to compromise the utility's ability to earn an authorized rate of return on investments. Utility-implemented measures to improve energy efficiency, mandated through legislation or the regulatory process, if effective, reduce energy consumption and thus reduce energy sales, potentially lowering a utility's revenues and earnings.

Q. CAN YOU DESRIBE A TYPICAL DECOUPLING MECHANISM?

A. The goal of a decoupling mechanism is to remove the link between the volume of a utility's sales and its revenues and earnings. Typically,

decoupling mechanisms involve the implementation of a rate adjustment rider charge which corrects for deviations from authorized revenues, including lost revenues. By "lost revenues," I mean the amount of the under-recovered fixed costs that are the result of reduced energy sales caused by the utility's promotion of energy efficiency.

Q. CAN RATE DESIGN BE UTILIZED TO ACCOMPLISH THE GOAL OF REMOVING THE LINK BETWEEN THE VOLUME OF A UTILITY'S SALES AND ITS REVENUES AND EARNINGS?

A. Yes. Through rate design, a utility can set rates to recover costs in a way that the utility's earnings are not dependent on its energy sales.

Q. IS DECOUPLING THROUGH A RATE DESIGN MECHANISM SUPERIOR TO DECOUPLING THROUGH A RATE ADJUSTMENT RIDER?

A. Yes. Decoupling through a rate design approach is superior for two primary reasons. First, the rate design approach allows the utility the opportunity to create rates that reflect the utility's cost of service and correctly account for cost causation. Creating rates that reflect the cost of service will minimize inter-class and intra-class subsidies and sends correct price signals to customers in addition to decoupling the relationship between earnings and energy sales.

Q. WHAT IS THE PRIMARY RATE DESIGN TECHNIQUE USED TO DECOUPLE A UTILITY'S EARNINGS AND ENERGY SALES?

A. The primary rate design technique used is the elimination of volumetric energy (per kWh) charges for the collection of demand costs, which decouples the utility's revenues and earnings from its volume of energy sales as no fixed costs will be collected on a volumetric energy charge. These costs are instead collected on a fixed monthly basis through the customer charge or the demand (kW). Additionally, and more importantly, the elimination of the energy charge allows for rates that reflect the utility's cost of service and correctly account for cost causation, eliminating the misallocation of demand cost responsibility that often occurs when fixed costs are collected on energy charges.

Q. HOW DOES THE INCLUSION OF A VOLUMETRIC ENERGY CHARGE MISALLOCATE DEMAND COST RESPONSIBILITY?

A. The inclusion of a volumetric energy charge ties the amount of fixed costs collected to a customer's load factor – that is, the amount of energy a customer consumes, in kWh, given its level of demand, in kW. Shifting of demand costs from per kW demand charges to per kWh energy charges results in a shift in demand cost responsibility from lower load factor customers to higher load factor customers. This results in misallocation of cost responsibility as higher load factor customers overpay for the demand-related costs incurred by the utility to serve them. In essence, two customers can have the same level of demand and cause the utility to incur the same amount of cost, but because one customer uses more

uses more kWh than the other, that customer will pay more of the incurred cost than the customer that uses fewer kWh.

Q. CAN YOU PROVIDE A SPECIFIC ILLUSTRATION OF THIS SHIFT IN DEMAND COST RESPONSIBILITY THAT RESULTS FROM THE APPLICATION OF A VOLUMETRIC ENERGY CHARGE?

A. Yes. Assume the following:

a) A utility has only two customers (Customer 1 and Customer 2), each with individual monthly peak demands of 20 kW, for a total monthly system load of 40 kW.

b) The annual cost to the utility to build and maintain the 40 kW infrastructure is $2,000, and the entire cost will be collected each year, so each customer has caused the utility to incur $1,000 of demand-related costs.

c) Customer 1 has a monthly demand of 20 kW and a load factor of 0.6, and thus consumes 105,120 kWh/year (20 kW * 0.6 * 8760).

d) Customer 2 has a monthly demand of 20 kW and load factor of 0.3, and thus consumes 52,560 kWh/year (20kW * 0.3 * 8760).

Q. IF THE DEMAND-RELATED COSTS WERE CHARGED ON A PER KW BASIS, WHAT WOULD THE PER KW CHARGE BE?

A. The charge would be $4.17 per kW, calculated by $2,000 / 40 kW / 12 months. Each customer would then pay $1,000 for the demand-related cost they impose on the system, calculated by 20 kW * $4.17/kW * 12.

Q. IF THE DEMAND-RELATED COSTS WERE CHARGED ON A PER KWH BASIS, WHAT WOULD THE PER KWH CHARGE BE?

A. If the utility were to charge the demand-related costs on a per kWh basis, the energy charge would be 1.27 cents/kWh (or $0.0127/kWh), calculated by $2,000 / 157,680 kWh, using total company sales (i.e., the sum of the two customers' annual kWh usage) as the denominator.

Q. WHAT WOULD EACH CUSTOMER PAY UNDER THE CALCULATED PER KWH CHARGE?

A. Customer 1, who caused the utility to incur $1,000 in demand-related costs, with a load factor of 0.6 and an annual usage of 105,120 kWh, would pay $1,333 ($0.0127/kWh * 105,120 kWh). Customer 2, who also caused the utility to incur $1,000 in demand-related costs, with a load factor of 0.3 and an annual usage of 52,560 kWh, would pay $667 ($0.0127/kWh * 52,560).

Q. IS THIS AN EQUITABLE RESULT?

A. No. Even though each customer caused the utility to incur $1,000 in fixed costs, the utility will be over-recovering from one customer and under-recovering from the other. Under the per kWh scenario, the utility would over-recover from Customer 1, the higher load factor customer, by $333 (i.e. $1,333 in revenues minus $1,000 in costs), and under-recover from Customer 2, the lower load factor customer, by $333 (i.e. $667 in revenues minus $1,000 in costs).

Q. WHAT IS THE SECOND REASON WHY DECOUPLING THROUGH A RATE DESIGN MECHANISM IS SUPERIOR TO DECOUPLING THROUGH A RATE ADJUSTMENT RIDER?

Rate design is an *ex ante* process – that is, the price for service is set in advance of customer's activities. With *ex ante* ratemaking, customers have the benefit of complete information related to the bill impacts of their energy efficiency efforts. A rate adjustment rider is an *ex post* adjustment – that is, the price for service is set after the usage. Additionally, typically the rate change is inversely proportional to customer efficiency efforts, so as customers implement more energy efficiency and cause more lost energy sales, the *ex post* rate adjustment increases. For customers that conserve energy, the rate adjustment rider may send a counterintuitive price signal due to increased rates and less bill savings even though substantial efforts were untaken to reduce energy consumption.

Q. IN GENERAL, WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S RATE DESIGN PROPOSAL IN THIS DOCKET?

A. The Company proposes, for each class, to cease collecting distribution costs through volumetric energy charges (on a per kWh basis), which is the key element to creating a decoupled rate design and instead collect those distribution costs on a demand (kW) basis. In eliminating the volumetric energy charges, the Company is proposing what it terms a "modified" straight fixed variable rate design, in which distribution rates will

have two components, a monthly customer charge, to collect customer related costs, and a distribution demand contribution ("DDC") charge, which is a demand-related charge, to collect demand related costs. *See* Direct Testimony of Joseph F. Janocha, page 7, line 21 to page 8, line 1 and page 9, lines 4 to 8. The DDC charge is defined in the tariff as:

> The level of a customer's electric demand, measured in kilowatts for the customer's premise, for purposes of establishing the distribution portion of the customer's bill when applied the Distribution Demand Charge. The DDC shall be equal to the customer's Peak Load Contribution for Transmission in effect during the time frame used to establish distribution rates. The DDC will remain fixed on a customer premise basis until changed as part of a distribution rate case. *See* Proposed Redline Tariffs, Revised Leaf No. 5.

Q. COULD YOU PLEASE DESCRIBE THE CURRENT LGS-S RATE STRUCTURE?

A. Currently, the Company collects demand costs from LGS-S customers through: 1) a monthly customer charge, 2) a per kW demand charge, and 3) a per kWh energy charge (i.e., a volumetric energy charge). The current LGS-S rates collect almost 26 percent of distribution revenues on the per kWh energy charge. *See* Exhibit JFJ-3, page 8.

Q. SPECIFICALLY, HOW DOES THE COMPANY PROPOSE TO CHANGE THE RATE DESIGN FOR SCHEDULE LGS-S?

A. The Company proposes to eliminate the volumetric energy charge and the (current) per kW demand charge and instead collect distribution costs

through a monthly customer charge and the Distribution Demand Contribution charge.

Q. DOES THE PROPOSED ELIMINATION OF THE VOLUMETRIC ENERGY CHARGE BETTER REFLECT THE COMPANY'S DISTRIBUTION COST OF SERVICE?

A. Yes. Customer and demand related costs are fixed costs and driven by number of customers and the capability to meet maximum demand, respectively, not by energy throughput. As I explained above, eliminating the volumetric energy charge for demand costs better aligns cost causation with cost responsibility.

Q. TURNING TO THE DDC CHARGE, HOW DOES THE COMPANY PROPOSE THE BILLING DETERMINANT BE SET FOR THIS CHARGE?

A. The Company proposes that the billing determinant for this charge be set by the customer premise-specific transmission peak load contribution ("Transmission PLC") during the time frame used to establish distribution rates. The DDC would remain fixed on a customer premise basis until changed as part of a distribution rate case. *See* Direct Testimony of Joseph F. Janocha, page 8, lines 10 through 12 and Proposed Redline Tariffs, leaf No. 5.

Q. DOES WALMART OPPOSE THE USE OF TRANSMISSION PLC AS THE BILLING DETERMINANT FOR THE DEMAND RELATED CHARGE?

A. Generally, no. However, there are several issues the Commission should consider regarding the implementation of this methodology.

Q. DOES THE COMPANY'S FILING INCLUDE ANY SPECIFIC INFORMATION ON HOW THE TRANSMISSION PLC IS CALCULATED?

A. No. The filing, including the Proposed Redline Tariffs, contains little information on how the Transmission PLC is calculated. This lack of information is a concern because, from the customer perspective, the rate setting process is not transparent, as the billed level of kW is not easily calculated or verified by the customer.

Q. IS THE COMPANY'S FILING CLEAR ON HOW NEW CUSTOMER TRANSMISSION PLC FACTORS WOULD BE CALCULATED UNDER THE PROPOSED RATE DESIGN?

A. No, it is not clear from the Company's filing how the Transmission PLC for a customer site is calculated in the instance of a new customer site, such as newly constructed facility, added to the system, or the sale of a customer site to a new owner. This is important to clarify in the approved tariffs, especially in the case of customers who, after acquiring a site, make improvements to the building's energy efficiency or add on-site renewable generation.

Q. WHAT IS YOUR RECOMMENDATION TO THE COMMISSION FOR RATE DESIGN IN THIS DOCKET?

A. My recommendations for rate design are:

1) The Commission should, at a minimum, adopt a distribution rate design in this docket that eliminates volumetric energy charges for the collection of demand costs; and

2) If the Commission approves the proposed rate design, it should order Delmarva to create a customer education process in which customers can, at no cost to the customer, access the underlying calculations for their Transmission PLC billing determinants. Additionally, the Commission should require the Company to include a full description of how the Transmission PLC is calculated in its tariff, including descriptions of calculations for new construction and the sale of a customer site to a new owner.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

Steve W. Chriss

Manager, State Rate Proceedings
Wal-Mart Stores, Inc.
Business Address: 2001 SE 10th Street, Bentonville, AR, 72716-0550
Business Phone: (479) 204-1594

EXPERIENCE

July 2007 – Present
Wal-Mart Stores, Inc., Bentonville, AR
Manager, State Rate Proceedings

June 2003 – July 2007
Public Utility Commission of Oregon, Salem, OR
Senior Utility Analyst (February 2006 – July 2007)
Economist (June 2003 – February 2006)

January 2003 - May 2003
North Harris College, Houston, TX
Adjunct Instructor, Microeconomics

June 2001 - March 2003
Econ One Research, Inc., Houston, TX
Senior Analyst (October 2002 – March 2003)
Analyst (June 2001 – October 2002)

EDUCATION

2001	**Louisiana State University**	M.S., Agricultural Economics
1997-1998	**University of Florida**	Graduate Coursework, Agricultural Education and Communication
1997	**Texas A&M University**	B.S., Agricultural Development B.S., Horticulture

TESTIMONY

2009

Virginia State Corporation Commission Case No. PUE-2009-00030: In the Matter of Appalachian Power Company for a Statutory Review of the Rates, Terms, and Conditions for the Provision of Generation, Distribution, and Transmission Services Pursuant to § 56-585.1 A of the Code of Virginia.

Public Service Commission of Utah Docket No. 09-035-15: In the Matter of the Application of Rocky Mountain Power for Approval of its Proposed Energy Cost Adjustment Mechanism.

Public Service Commission of Utah Docket No. 09-035-23: In the Matter of the Application of Rocky Mountain Power for Authority To Increase its Retail Electric Utility Service Rates in Utah and for Approval of Its Proposed Electric Service Schedules and Electric Service Regulations.

Colorado Public Utilities Commission Docket No. 09AL-299E: Re: The Tariff Sheets Filed by Public Service Company of Colorado with Advice Letter No. 1535 – Electric.

Arkansas Public Service Commission Docket No. 09-008-U: In the Matter of the Application of Southwestern Electric Power Company for Approval of a General Change in Rates and Tariffs.

Corporation Commission of the State of Oklahoma Docket No. PUD 200800398: In the Matter of the Application of Oklahoma Gas and Electric Company for an Order of the Commission Authorizing Applicant to Modify its Rates, Charges, and Tariffs for Retail Electric Service in Oklahoma.

Public Utilities Commission of Nevada Docket No. 08-12002: In the Matter of the Application by Nevada Power Company d/b/a NV Energy, filed pursuant to NRS §704.110(3) and NRS §704.110(4) for authority to increase its annual revenue requirement for general rates charged to all classes of customers, begin to recover the costs of acquiring the Bighorn Power Plant, constructing the Clark Peakers, Environmental Retrofits and other generating, transmission and distribution plant additions, to reflect changes in cost of service and for relief properly related thereto.

New Mexico Public Regulation Commission Case No. 08-00024-UT: In the Matter of a Rulemaking to Revise NMPRC Rule 17.7.2 NMAC to Implement the Efficient Use of Energy Act.

Indiana Utility Regulatory Commission Cause No. 43580: Investigation by the Indiana Utility Regulatory Commission, of Smart Grid Investments and Smart Grid Information Issues Contained in 111(d) of the Public Utility Regulatory Policies Act of 1978 (16 U.S.C. § 2621(d)), as Amended by the Energy Independence and Security Act of 2007.

Louisiana Public Service Commission Docket No. U-30192 *Phase II (February 2009)*: Ex Parte, Application of Entergy Louisiana, LLC for Approval to Repower Little Gypsy Unit 3 Electric Generating Facility and for Authority to Commence Construction and for Certain Cost Protection and Cost Recovery.

South Carolina Public Service Commission Docket No. 2008-251-E: In the Matter of Progress Energy Carolinas, Inc.'s Application For the Establishment of Procedures to Encourage Investment in Energy Efficient Technologies; Energy Conservation Programs; And Incentives and Cost Recovery for Such Programs.

2008
Colorado Public Utilities Commission Docket No. 08A-366EG: In the Matter of the Application of Public Service Company of Colorado for approval of its electric and natural gas demand-side management (DSM) plan for calendar years 2009 and 2010 and to change its electric and gas DSM cost adjustment rates effective January 1, 2009, and for related waivers and authorizations.

Public Service Commission of Utah Docket No. 07-035-93: In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations, Consisting of a General Rate Increase of Approximately $161.2 Million Per Year, and for Approval of a New Large Load Surcharge.

Indiana Utility Regulatory Commission Cause No. 43374: Petition of Duke Energy Indiana, Inc. Requesting the Indiana Utility Regulatory Commission Approve an Alternative Regulatory Plan for the Offering of Energy Efficiency, Conservation, Demand Response, and Demand-Side Management.

Public Utilities Commission of Nevada Docket No. 07-12001: In the Matter of the Application of Sierra Pacific Power Company for authority to increase its general rates charged to all classes of electric customers to reflect an increase in annual revenue requirement and for relief properly related thereto.

Louisiana Public Service Commission Docket No. U-30192 *Phase II*: Ex Parte, Application of Entergy Louisiana, LLC for Approval to Repower Little Gypsy Unit 3 Electric Generating Facility and for Authority to Commence Construction and for Certain Cost Protection and Cost Recovery.

Colorado Public Utilities Commission Docket No. 07A-420E: In the Matter of the Application of Public Service Company of Colorado For Authority to Implement and Enhanced Demand Side Management Cost Adjustment Mechanism to Include Current Cost Recovery and Incentives.

2007
Louisiana Public Service Commission Docket No. U-30192: Ex Parte, Application of Entergy Louisiana, LLC for Approval to Repower Little Gypsy Unit 3 Electric Generating Facility and for Authority to Commence Construction and for Certain Cost Protection and Cost Recovery.

Public Utility Commission of Oregon Docket No. UG 173: In the Matter of PUBLIC UTILITY COMMISSION OF OREGON Staff Request to Open an Investigation into the Earnings of Cascade Natural Gas.

2006
Public Utility Commission of Oregon Docket No. UE 180/UE 181/UE 184: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY Request for a General Rate Revision.

Public Utility Commission of Oregon Docket No. UE 179: In the Matter of PACIFICORP, dba PACIFIC POWER AND LIGHT COMPANY Request for a general rate increase in the company's Oregon annual revenues.

Public Utility Commission of Oregon Docket No. UM 1129 *Phase II*: Investigation Related to Electric Utility Purchases From Qualifying Facilities.

2005
Public Utility Commission of Oregon Docket No. UM 1129 *Phase I Compliance*: Investigation Related to Electric Utility Purchases From Qualifying Facilities.

Public Utility Commission of Oregon Docket No. UX 29: In the Matter of QWEST CORPORATION Petition to Exempt from Regulation Qwest's Switched Business Services.

2004
Public Utility Commission of Oregon Docket No. UM 1129 *Phase I*: Investigation Related to Electric Utility Purchases From Qualifying Facilities.

ENERGY INDUSTRY PUBLICATIONS AND PRESENTATIONS
Chriss, S. (2006). "Regulatory Incentives and Natural Gas Purchasing – Lessons from the Oregon Natural Gas Procurement Study." Presented at the 19th Annual Western Conference, Center for Research in Regulated Industries Advanced Workshop in Regulation and Competition, Monterey, California, June 29, 2006.

Chriss, S. (2005). "Public Utility Commission of Oregon Natural Gas Procurement Study." Public Utility Commission of Oregon, Salem, OR. Report published in June, 2005. Presented to the Public Utility Commission of Oregon at a special public meeting on August 1, 2005.

Chriss, S. and M. Radler (2003). "Report from Houston: Conference on Energy Deregulation and Restructuring." USAEE Dialogue, Vol. 11, No. 1, March, 2003.

Chriss, S., M. Dwyer, and B. Pulliam (2002). "Impacts of Lifting the Ban on ANS Exports on West Coast Crude Oil Prices: A Reconsideration of the Evidence." Presented at the 22nd USAEE/IAEE North American Conference, Vancouver, BC, Canada, October 6-8, 2002.

Contributed to chapter on power marketing: "Power System Operations and Electricity Markets," Fred I. Denny and David E. Dismukes, authors. Published by CRC Press, June 2002.

Contributed to "Moving to the Front Lines: The Economic Impact of the Independent Power Plant Development in Louisiana," David E. Dismukes, author. Published by the Louisiana State University Center for Energy Studies, October 2001.

Dismukes, D.E., D.V. Mesyanzhinov, E.A. Downer, S. Chriss, and J.M. Burke (2001). "Alaska Natural Gas In-State Demand Study." Anchorage: Alaska Department of Natural Resources.

VERIFICATION

I affirm under penalties for perjury that the foregoing representations are true to the best of my knowledge, information, and belief.

Signed: _____ Date: 2/8/2010

Steve W. Chriss

STATE OF ARKANSAS
PAULA F. McNEIL
NOTARY PUBLIC
BENTON COUNTY
My Comm. Expires 6/4/2013

Paula F. McNeil

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF DELAWARE

IN THE MATTER OF THE APPLICATION OF DELMARVA POWER & LIGHT COMPANY FOR AN INCREASE IN ELECTRIC BASE RATES AND MISCELLANEOUS TARIFF CHANGES (FILED SEPTEMBER 18, 2009)	)	**PSC DOCKET NO. 09-414**
IN THE MATTER OF THE APPLICATION OF DELMARVA POWER & LIGHT COMPANY FOR APPROVAL OF A MODIFIED FIXED VARIABLE RATE DESIGN FOR ELECTRIC RATES (FILED JUNE 25, 2009)	)	**PSC DOCKET NO. 09-276T**

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing ***Direct Testimony of Steve W. Chriss on behalf of Wal-Mart*** was served via regular mail and email this 10th day of February 2010, to:

Ruth Ann Price, Esq., Senior Hearing Examiner
Delaware Public Service Commission
861 Silver Lake Boulevard
Cannon Building, Suite 100
Dover, DE 19904

G. Arthur Padmore, Esq., Public Advocate
Michael Sheehy, Deputy Public Advocate
Justin Michael Murphy, Esq., Utility Analyst
Division of the Public Advocate
820 N. French Street, 4th Floor
Wilmington, DE 19801

Janis Dillard, Regulatory Policy Administrator
Delaware Public Service Commission
861 Silver Lake Boulevard
Cannon Building, Suite 100
Dover, DE 19904

Regina A. Iorii, Esq.
Deputy Attorney General
861 Silver Lake Boulevard
Cannon Building, Suite 100
Dover, DE 19904

Todd L. Goodman, Esq., Counsel
Delmarva Power & Light Company
800 King Street, 5th Floor
P. O. Box 231
Wilmington, DE 19899

Heather G. Hall
W. Michael VonSteuben
Delmarva Power
Regulatory Affairs
P. O. Box 9239
Newark, DE 19714-9239

Glenn C. Kenton, Esq.
Richards Layton & Finger
P. O. Box 551
Wilmington, DE 19899

Joseph C. Handlon, Esq.
Staff Counsel
861 Silver Lake Boulevard
Cannon Building, Suite 100
Dover, DE 19904

Michael J. Quinan
Christian & Barton, L.L.P.
909 East Main Street, Suite 1200
Richmond, Virginia 23219-3095

David N. Bloom, Public Utilities Analyst
Delaware Public Service Commission
861 Silver Lake Boulevard
Cannon Building, Suite 100
Dover, DE 19904

Holly Rachel Smith